

8EHQ-0694-13084

UNION
CARBIDE

Contains No CBI

UNION CARBIDE CORPORATION 39 OLD RIDGEBURY ROAD, DANBURY, CT 06817-0001

(A) June 24, 1994

TSCA Document Processing Center (7408)
Office of Pollution Prevention & Toxics
U.S. Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

ORIGINAL

51 JUN 28 AM 8:07

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8EHQ-94-13084
INIT 06/28/94

Attn: 8(e) Coordinator

Dear Sir or Madam:

Union Carbide Corporation ("Union Carbide") was recently informed of information about PCB levels in previously-retrofitted electrical transformers which the Agency may regard as being reportable under its current TSCA § 8(e) guidelines.

A Union Carbide subsidiary, Unison Transformer Services, Inc. ("UNISON"), was formerly in the business of retrofitting electrical transformers and other equipment so as to lower the level of PCB contamination of dielectric fluid, in most cases to below 50 ppm. After retrofitting, the contaminated retrofit material was taken to UNISON's facility in Henderson, Kentucky, where the PCBs were separated out. The PCBs were sent for incineration, and the retrofit material became available for reuse. UNISON sold its retrofit business in August 1991 to ENSR Corporation ("ENSR"), whose parent is American NuKEM Corporation ("NuKEM"). However, UNISON retained the facility in Henderson and still operates it, with ENSR as its customer.

Recently, NuKEM notified Union Carbide that it had learned that a "substantial number" of transformers retrofitted using UNISON's "RECLASS 50" SM system to PCB levels below 50 ppm now have levels substantially above 50 ppm. NuKEM gave as an example a SUNY transformer retrofitted about two years ago (apparently to below 50 ppm) which NuKEM alleges was determined later to have a level of about 400 ppm.

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8/02/95

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While it is not clear that this information is subject to reporting under Section 8(e), or that Union Carbide or UNISON are themselves subject to Section 8(e) with respect to this information, we are submitting it to the Agency because of EPA's continuing interest in reclassification of electrical transformers.

Very truly yours,



William C. Kuryla, Ph.D.
Associate Director
Product Safety
[203-794-5230]

Triage of 8(e) Submissions

Date sent to triage: _____

NON-CAP

CAP

Submission number: 13084A

TSCA Inventory:

Y

N

D

Study type (circle appropriate):

Group 1 - Dick Clements (1 copy total)

ECO

AQUATO

Group 2 - Ernie Falke (1 copy total)

ATOX

SBTOX

SEN

w/NEUR

Group 3 - Elizabeth Margosches (1 copy each)

STOX

CTOX

EPI

RTOX

GTOX

STOX/ONCO

CTOX/ONCO

IMMUNO

CYTO

NEUR

Other (FATE, EXPO, MET, etc.):

EXPO

Notes:

THIS IS THE ORIGINAL 8(e) SUBMISSION; PLEASE REFILE AFTER TRIAGE DATABASE ENTRY

For Contractor Use Only

entire document 0

1

2 pages 1,2

pages 1,2

Notes:

Contractor reviewer:

POR

Date:

2/8/96

CECATS DATA
Submission # GENO 0694-13084 SEQ A

TYPE INT SUPP FLWP

SUBMITTER NAME: Union Carbide Corporation

INFORMATION REQUESTED: FLWP DATE: _____
0301 NO INFO REQUESTED
0302 INFO REQUESTED (TECH)
0303 INFO REQUESTED (WRL ACTIONS)
0304 INFO REQUESTED (REPORTING RATIONALE)
DISPOSITION:
0305 REFER TO CHEMICAL SCREENING
0306 CAP NOTICE

VOLUNTARY ACTIONS:
0301 NO ACTION REQUIRED
0302 STUDY PLAN IN PROGRESS
0303 INITIATION IN WORK PROGRESS
0304 LABORATORY TESTS
0305 PROCESSING IN PROGRESS
0306 APPEAL DISCONTINUED
0307 PRODUCTION DISCONTINUED
0308 CONFIDENTIAL

SUB DATE: 06/24/94 OTS DATE: 06/28/94 CRAD DATE: 08/02/95

CHEMICAL NAME

Polychlorinated Biphenyls (PCB)

CASE

1336-36-3

INFORMATION TYPE	PLC	INFORMATION TYPE	PLC	INFORMATION TYPE	PLC
0201 ONCO (HUMAN)	01 02 04	0206 EPICLIN	01 02 04	0301 BASILINO (ANIMAL)	01 02 04
0202 ONCO (ANIMAL)	01 02 04	0207 HUMAN EXPOS (PROD CONTAM)	01 02 04	0302 BASILINO (HUMAN)	01 02 04
0203 CELL TRANS (IN VITRO)	01 02 04	0208 HUMAN EXPOS (ACCIDENTAL)	01 02 04	0303 CHEMISTS PROP	01 02 04
0204 MUTA (IN VITRO)	01 02 04	0209 HUMAN EXPOS (MONITORING)	01 02 04	0304 CLASTO (IN VITRO)	01 02 04
0205 MUTA (IN VIVO)	01 02 04	0210 BOMBUA TOX	01 02 04	0305 CLASTO (ANIMAL)	01 02 04
0206 REPRO/TERATO (HUMAN)	01 02 04	0211 ENV. OCCURRENCE	01 02 04	0306 CLASTO (HUMAN)	01 02 04
0207 REPRO/TERATO (ANIMAL)	01 02 04	0212 BASH ENCI OF ENV CONTAM	01 02 04	0307 DNA DAMAGE/REP	01 02 04
0208 NEURO (HUMAN)	01 02 04	0213 RESPONSE REPORT DELAY	01 02 04	0308 PRODUCE/PROC	01 02 04
0209 NEURO (ANIMAL)	01 02 04	0214 PRODUCTION RATIONALE	01 02 04	0309 OTHER	01 02 04
0210 ACUTE TOX (HUMAN)	01 02 04	0215 CONFIDENTIAL	01 02 04		
0211 CHR. TOX (HUMAN)	01 02 04	0216 ALLERG (HUMAN)	01 02 04		
0212 ACUTE TOX (ANIMAL)	01 02 04	0217 ALLERG (ANIMAL)	01 02 04		
0213 SUB ACUTE TOX (ANIMAL)	01 02 04	0218 METABOLISM/ACD (ANIMAL)	01 02 04		
0214 SUB CHRONIC TOX (ANIMAL)	01 02 04	0219 METABOLISM/ACD (HUMAN)	01 02 04		
0215 CHRONIC TOX (ANIMAL)	01 02 04	0220			

INFORMATION NON-CON INVENTORIAL ONGOING REVIEW REASON TOXICOLOGICAL COMMENTS USE: PRODUCTION:

CAS SR NO YES YES (OCCURRENCE) N/A LOW
NO (CONTINUE) NO HIGH

IN REMEDIATION
USE: NonCap, contaminated electrical transformers